

MOSER LAW FIRM, PC



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VIA ECF

Hon. Brian M. Cogan, USDJ
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Batista Rodriguez v. Electronic Deals, Inc.*, 21-cv-03110

Dear Judge Cogan:

I represent the Plaintiffs in the above referenced matter. I write to request a two week adjournment of the Plaintiff's motion for conditional certification and court authorized noticing under the FLSA. At a conference on July 15, 2021, I informed the Court that I believed we would be able to file a motion for conditional certification on or before August 5, 2021.

My wife has been frequenting doctors since mid-July and has surgery scheduled in August. She is the primary caregiver for our 2 year old daughter and will be incapacitated for at least 4 weeks. Family living out of state will be visiting to help, but the present situation has significantly interfered with my work production and schedule. I therefore request that the briefing schedule be amended as follows:

	Original Date	New Date
Motion	8/5/2021	8/20/2021
Opposition	8/19/2021	9/3/2021
Reply	8/26/2021	9/10/2021

This is the first request for an extension. Opposing counsel has consented to this request.

Respectfully requested,

Steven J. Moser
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cc: All Counsel of Record (VIA ECF